



UNITED STATES ENVIRONMENTAL PROTECTION

REGION 7
25 FUNSTON ROAD
KANSAS CITY, KANSAS 66115

Site:	Martha
ID #:	MOD980633069
Break:	1.2
AGENCY:	AR
	4-20-87

RECEIVED

APR 28 1987

April 20, 1987

MEMORANDUM

CMPL SECTION

SUBJECT: Martha Rose Chemical Status, January - March 1987

FROM: Charles P. Hensley *CPH*
Chief, EP&R/ENSV

TO: Craig Smith
SPFD

The Emergency Planning & Response Branch (EP&R) has been overseeing the Martha Rose Chemical facility on a bi-monthly basis. Each visit often included an inspection of the interior of the main building.

Please keep our On-Scene Coordinator (OSC) posted on decisions and discussions by your personnel concerning this site. The following is a brief outline of those site visits.

January 12, 1987

On site with Russ Krohn (Weston/TAT). The following items were discussed:

1. The OSC requested the removal of the oil layer from the pit in the "process room." This was requested due to the fact Clean Sites, Inc., (CSI) had no plans to remove the oil as it contained high levels of PCBs and the oil was starting to emulsify with the water in the pit.
2. CSI had completed a surface soil investigation of the area on the east side of the property. It was indicated the sampling should be continued in the area west of the building to complete the surface characterization of the entire site.
3. The submitted work plans were very generic and lacked enough site-specific information to give the Agency an understanding of what the Potential Responsible Partys (PRPs) were proposing to do.

During this site visit, a letter concerning the drums of napalm was delivered to the Dwight Thomas residence at Counsel's (CNSL) request. The Buxton residence was also visited to check on the status of the boat.



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SUPERFUND RECORDS

February 2, 1987

George Hess and Roy Crossland, Environmental Protection Agency (EPA), returned to Holden. At the request of CNSL they delivered a follow-up letter to the Dwight Thomas residence. They also inspected the boat on the Buxton property. Two wipe samples (K358D001 and K358D002) were obtained from the boat in order for the Centers for Disease Control (CDC) to make a health determination. While in Holden they met Mr. Buxton who gave them the following information:

1. Mr. Buxton was given some processed PCB oil to try but never purchased it knowingly.
2. He indicated a lot of people in the area used the oil. Apparently, when the oil was delivered it would still be "hot." He indicated Rose had Allis Chalmers, Kansas City, test the oil and reported it would increase horsepower by 25%. One problem was that the fuel would leak out of seals in the engine.
3. According to Mr. Buxton, Lawder Oil, (Holden) purchased a lot of oil from Rose Chemical. Also, Kansas City, Missouri, was using the oil to run the city buses. It was his understanding the oil was used at the local asphalt plant.
4. Apparently Mr. Buxton contends Mr. McCoy moved the boat to it's present location without his prior knowledge. Also, Mr. McCoy used processed oil in his dozer.
5. The last item Mr. Buxton indicated, but would not expound on, was why we were picking on the "little people," like himself, and not the 15 people high in the community.

The items discussed at the facility with Cliff Kline of CSI are as follows.

1. CSI showed the work plans submitted by ChemWaste on December 8, 1986. The plans were contained in three volumes. The first was labelled SPCC Plan and mostly contained the contingency plan provided by EPA and given to CSI. The second was a sampling and Quality Assurance/Quality Control (QA/QC) Plan. This plan, approximately 17 pages, indicated the grid size for the surface soil samples as 50' x 50' with 25 aliquots each. The last was the inventory plan, twelve pages in length, developed prior to the present computer system. The plans obviously contained more detail than the ones submitted by the PRPs to EPA.
2. Apparently, CSI and ChemWaste conduct a walk through inspection on a daily basis at the end of the day.
3. CSI submitted an inventory computer printout (dated 1/29/87) which was given to Steve Kinser (EPA/SPFD) on 2/3/87.

February 17, 1987

Received call from a Ms. Rowan of Kirkwelding (221-3030) who was trying to locate seven gas welding cylinders leased to Amercian Steel and American Steel's new address. (Apparently, American Steel owed money to Kirkwelding). The OSC indicated EPA removed four cylinders, 2 carbon dioxide, 1 argon and 1 propane. Ms. Rowan requested to have the cylinders back when, or if, they are decontaminated.

February 18, 1987

Ed Skowronski indicated that, if the boat is to be left on site and or used as a hog house, it should be decontaminated down to 0.5 ug/per 100 cm².

February 20, 1987

George Hess returned to the Holden facility. In addition to the site inspection, the draft work plans submitted the previous day were discussed. The following items were discussed with Cliff Kline.

1. PRPs need to address the 20 - 30 ppm PCBs at the storm sewer outfall and the creek.
2. QA plan should indicate who is responsible for QA and how a problem will be corrected.
3. Area of May spill by the loading dock should be addressed.
4. Samples should be stored in a secured area.
5. The three aliquots from each bulk liquid tank will be combined to make one sample per tank.

During the site inspection, a security firm was on site to evaluate the facility. Due to the existing building restraints, it would be nearly impossible to install an effective security system. ChemWaste discovered a storm sewer line between the north and south buildings. Mr. Kline wanted to know how to address the problem. It was indicated to sample sediment in intake and outfall. If contaminated, clean out the line accordingly.

February 20, 1987

Cliff Kline, CSI, was telephoned by George Hess, OSC, to go over the revised (2/87) Health and Safety Plan. The following items were discussed:

1. The proposed water discharge level of 5 ppm is contrary to all discussions and recommendations proposed by the OSC through discussion with the Missouri Department of Natural Resources (MDNR), National Pollution Discharge Elimination System (NPDES), personnel. The criteria should be the following:

<1.0 ug/liter PCBs

<1.0 ml/liter settleable solids w/50 minute retention time

Mr. Kline indicated he would correct. The PRPs are to get an NPDES permit from the State of Missouri, so the OSC does not have to be onsite every time the PRPs need to discharge storm water.

2. The safety plan and contingency plan should be consistent. The plans use two different hospitals in the event of emergencies. The plan should pick one or the other or specifically mention both.

3. The contingency plan should have the site telephone numbers listed.

February 24, 1987

Cliff Kline called to request the release of water from the bulk oil tank impoundments. The western most bermed area was nondetected at 0.1 ug/liter PCBs. The OSC agreed to allow them to slowly siphon the water out of this diked area and allow water to drain across the site. The tank farm pond by the west dock was 32 ug/liter PCBs. The OSC indicated water could not be released until treated and sampled to <1 ug/liter PCBs.

March 11, 1987

George Hess was on site for a routine site inspection. Jim O'Brien was on site for CSI while Cliff Kline was on vacation. At the request of Martha Steincamp EPA/CNSL, CSI was shown the boat on the Buxton property. The following items were discussed.

1. Apparently tank #ENR-051 contained a mixture of what appeared to be gasoline, kerosene and water. The materials were stratified in the tank and had a total PCB content of approximately 500 ppm. Mr. O'Brien indicated the material had a flash point of <70⁰F. The material would be transported off site on 3/12/87 to the SCA incinerator near Chicago. Mr. O'Brien requested EPA be present during the transfer operation from the tank to the transport trucks.

2. The OSC requested CSI to adjust the plastic sheeting covering items EPA returned during the removal action. Apparently, the bankruptcy trustee had an appraiser and a clean-up contractor onsite to inspect the items and they did not cover/recover all the items inspected.

3. MDNR was expected to issue the permit, shortly, for the disposal of the Sewage Plant Sludge at the Double D Disposal Facility near Carrollton, Missouri.

4. The official work plan resubmittal would be on March 16, 1987.

5. ChemWaste would sign the SPCC plan.

6. ChemWaste was in the process of phasing down and demobilizing.

7. Due to a conversation the previous day between Gary Johnson and Bill Ward, Mr. O'Brien did not want to give the OSC any sample data officially until the lawyers had come to some consensus.

8. The new air monitoring results would be available on March 18, 1987.

March 12, 1987

Roy Crossland and George Hess were on site during the transfer operation of the contents of tank 51 to the transport trucks. The material was transported offsite in two 5,000 gallon trucks. The Holden police chief was also at the site during the operation.

March 16, 1987

George Hess telephoned Cliff Kline and the following was discussed.

1. CSI has received a permit from MDNR for the sewage sludge to go to the Carrollton disposal facility. Weather permitting, the material would be moved on March 18, 1987.
2. When ChemWaste leaves the site, the emergency equipment would still be available on site.
3. CSI had not completed an application for an NPDES permit. This activity would become a higher priority now that ChemWaste activities were concluded.
4. The move of the Buxton boat was discussed. The proposed place to store the boat is outside and to the west of the south building. This location was agreed upon due to the fact the area is presently contaminated with PCBs at a level of 10 - 40 ppm. It was requested that the boat not be required to be bermed due to the constant maintenance required to discharge the collected storm water. It was indicated that the OSC would check into that possibility.
5. The OSC indicated approximately one drum of contaminated rags would be returned to the site from the cleanup of the Hugh's Garage.
6. Mr. Kline requested the OSC be onsite to show him the boat and discuss Administrative Order requirements.

March 19, 1987

George Hess was on site to meet with Cliff Kline, to monitor on-site progress and discuss PRP compliance with the AO. During the inspection, ChemWaste was in the process of loading and transporting the Holden POTW stabilized sludge to Carrollton, Missouri, for disposal. The following items were addressed.

1. The sample results would be available to EPA after Henry Drushel (CSI - QA/QC) reviewed and compiled the report. This report should be available

the end of April or the first of May. The report would have the lab data and a site map showing sample locations.

2. On-site air sampling data was obtained up through last week and will be transmitted through the PRPs.

3. The revised work plans will be submitted by the Steering Committee, not CSI.

4. Mr. Kline was reminded that the status reports submitted to EPA should include manifests and destruction papers. The OSC indicated the reports need to be more detailed and include a schedule of proposed activities. Also, it would be good to document EPA site visits and discussions.

5. Apparently, the contingency submitted in the work plans was for the activities while ChemWaste was on site. The equipment which is to remain on site would consist of a trailer foam unit, bulk liquid tank (CWM) small spill clean-up materials, a backhoe or bobcat and probably one forklift. At the present time, no clean-up personnel would be on site when ChemWaste completed demobilization around April 15. CSI is going to provide the Holden Fire Department with some contingency training. The vendor of the portable foam unit will teach the locals on its useage. Arrangements are being made with the University of Missouri - Columbia to put on a course for local responders on how to deal with an incident at the facility.

6. If CSI is to provide any personnel and equipment for any inventory work, EPA will have to come to some agreement with the PRP Steering Committee. At the present time, CSI will not provide anything for the upcoming inventory work unless approved by the Generator Committee.

7. Concern was expressed about allegations made by the Carrollton group through the Bankruptcy Trustee that items returned to the site during the removal activities did not reach the site or have since left the site. CSI indicated nothing had left the site other than items requested by EPA to be removed (ie. sodium drums and other hazardous materials). When contractors leave the site, they will be checked.

8. If the bankruptcy wants to look for items EPA has not returned to the site which the Carrollton group removed from the site prior to July 3, 1986, Jerry Hollingworth, CSI (former Danguard Security Officer), indicated he and Cindy Collier (Danguard Security Guard who has been on site since the beginning) could review their reports and compare to what EPA returned to the site.

9. Prior to leaving Holden, Cliff Kline and the OSC went to the Buxton property to inspect the boat and to obtain its dimensions. (40' x 12' x approx. 16' high)